

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Robin Johnson,

Case: 1:19-mj-30267
Judge: Morris, Patricia T.
Filed: 05-16-2019 At 01:19 PM
SEALED MATTER (krc)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 16, 2019 in the county of Isabella in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 875(c); Threatening Communications.

Offense Description

knowingly and willfully transmitted in interstate and foreign commerce, communications, to wit: a Facebook post, to C.J., and the communication contained a threat to injury C.J.'s child[ren] in violation of Title 18 United States Code, section 875(c).

This criminal complaint is based on these facts:

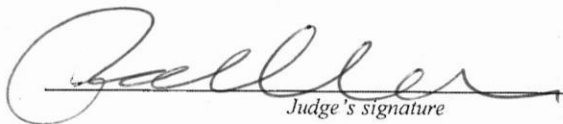
See attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Steven D. Larson, SA/FBI
Printed name and title

Sworn to before me and signed in my presence.

Date: 05/16/2019City and state: Bay City, Michigan


Judge's signature

Patricia T. Morris, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT
FOR ROBIN JOHNSON**

I, Steve Larson, being duly sworn, depose and state:

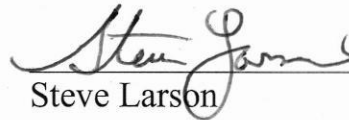
1. I am a special agent with the Federal Bureau of Investigation and have been so employed for approximately 19 years. During my career I have been involved in numerous investigations concerning threats. The following is based on a statement from witnesses and statements from other law enforcement officers and individuals.
2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that Robin Johnson committed the offenses of threatening communications on or about May 16, 2019, in violation of 18 U.S.C. § 875(c) and therefore it does not contain all of the facts known to me. Additionally, unless otherwise noted, wherever in this affidavit I assert that an individual made a statement, that statement is described in substance herein and is not intended to be a verbatim recitation of such statement.
3. Michael Lee Johnson is currently charged with unlawful imprisonment, assault of an intimate partner by strangulation, assault of an intimate partner by suffocation, interstate domestic violence, assault while striking, beating, or wounding, and numerous counts of witness tampering in federal court in the

Eastern District of Michigan. The victim in that case is Michael's former girlfriend, C.J.

4. According to C.J., the interstate domestic violence was committed in the presence of her two young children. Michael is not the father of these children.
5. Michael has been in custody from approximately November 2018 to present. During that time in jail defendant has asked his mother, Robin Johnson to post numerous things on Facebook so that C.J. could see them.
6. During Michael's incarceration Robin has posted many negative things on Facebook about C.J. Robin also posted a number of photos of C.J. on Robin's Facebook page with degrading and negative things written about C.J. Some of those post which include photos of C.J. include "I have evidence of what the dark evil snake did to my son;" and "C**** [name omitted] lied, cheated on my son. She's a who**."
7. A number of these posts have been removed by Facebook and Robin has been warned that her Facebook account would be closed down if she continued.
8. On or about May 16, 2019, Robin posted the following on Robin's Facebook page with a photo of Michael: "You take mine? I take YOURS, EYE FOR AN EYE! This is my first born. Do you have a first born? Son for son. Daughter for son? Trade for trade ___ I'm not GOD. I AM A MOTHER! WORSE THAN GODS WRATH! KNOW THAT!"

9. On May 16, 2019, at around 9:16 a.m. Michael called Robin from the Clare County Jail. During that call Robin tells Michael about the Facebook post mentioned in #8 above. She then says “she’ll [referring to C.J.] understand what I mean.” Clearly, Robin intended for C.J. to receive this communication which amount to a threat to one or both of C.J. young children.

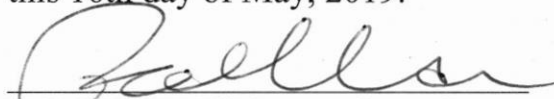
10. Based on the above-described information, there is probable cause to believe that on or around May 16, 2019, Robin Johnson committed the crime of threatening communications, in violation of 18 U.S.C. § 875(c).



Steve Larson

FBI

Subscribed and sworn to before me
this 16th day of May, 2019.



HON. PATRICIA T. MORRIS
United States Magistrate Judge